EXHIBIT 1

Condensed Transcript

In the Matter Of:

NEW ENGLAND COMPOUNDING PHARMACY INC. PRODUCTS LIABILITY

VIDEOTAPED DEPOSITION OF RITU T. BHAMBHANI, M.D.

February 10, 2016



100 Mayfair Royal 181 Fourteenth Street Atlanta, GA 30309 404.847.0999 NEW ENGLAND COMPOUNDING PHARMACY INC. PRODUCTS LIABILITY VIDEOTAPED DEPOSITION OF RITU T. BHAMBHANI, M.D. on 02/10/2016

Page 1

1	UNITED STATES DISTRICT COURT			
2	FOR THE DISTRICT OF MASSACHUSETTS			
3				
4	IN RE: NEW ENGLAND			
5	COMPOUNDING PHARMACY, INC. MDL No. 2419			
б	PRODUCTS LIABILITY LITIGATION Master Docket			
7	1:13-md-02419-RWZ			
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11	VIDEOTAPED DEPOSITION DUCES TECUM			
12	OF RITU T. BHAMBHANI, M.D.			
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14				
15	Wednesday, February 10, 2016			
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23	Reported by: Lori J. Goodin, RPR, CLR, CRR,			
24	Realtime Systems Administrator			
25	Assignment No. 26236			



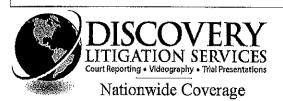
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NEW ENGLAND COMPOUNDING PHARMACY INC. PRODUCTS LIABILITY VIDEOTAPED DEPOSITION OF RITU T. BHAMBHANI, M.D. on 02/10/2016

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1	Page 70 MPA was wasn't compounded? I think that was my	1.	Page 72 black and white as that. When I was at Harford
2	original question.	2	County Ambulatory Surgical Center, the physician
3	A. If I did, I do not remember.	3	who had brought me on board at Franklin Square
4	Q. Okay. And prior to 2013, had you	4	also was coming to Harford County Ambulatory
5	used any MPA that was not compounded?	5	Surgery Center, because when I left Franklin
6	And let me narrow that because that	6	Square to become, to come to Harford County
7	takes you all of the way back to your residency.	7	Ambulatory Surgery Center, he left Franklin
8	A. Yes, to my residency.	8	Square at some point soon after I did and started
9	Q. And I don't want to do that.	9	his own practice.
10	Since coming to, being in private	10	And, until he had, I guess, his
11	practice, had you used any MPA that was not	11	location set up to be able to do procedures, he
12	compounded before 2013?	12	was coming to Harford County Ambulatory Surgery
1.3	A. So you are saying from 2008 on?	13	Center to do procedures.
14	Q. No. I'm saying from 2000, from 2000	14	And he introduced, definitely, me to
15	to 2013.	15	the possibility of being able to use a
16	MS. STEINER: Across the spectrum of	16	preservative-free steroid.
17	different locations?	17	And he was using preservative-free
18	BY MR. ROTH;	18	MPA at the time. That is the same physician I
19	Q. Correct,	19	have worked with for three years at Franklin
20	A. So, Franklin Square included, the	20	Square about ten years my senior. And, he knew
21	first job included?	21	that I had had a couple of patients I was using
22	Q. Yes.	22	the same, for the most part I think, the same
23	A. Had I used non-compounded MPA?	23	steroid I had trained with at Franklin Square.
24	Q. Yes.	24	And he knew that I had had a couple
25	A. I have to think, I am what I can	25	of patients with some side effects. And when he
			The trigging on the state of th
1	Page 71 say is I had used non-compounded steroid, but I'm	1	Page 73 saw me at Harford County Ambulatory Surgery
2	not sure if I had used non-compounded MPA	2	Center he was using preservative-free MPA and
3	specifically.	3	suggested, not just me, but there was another
4	Q. Okay. And, that is a good	4	pain provider who was doing pain procedures at
5	distinction.	5	Harford County Ambulatory Surgery Center that we
6	At Box Hill, between 2013 and 2008,	6	try that for the reason that, since the active
7	had you used non-compounded steroids for epidural	7	medication that we were looking for therapeutic
8	injections?	В	factors of the steroid and that is the same, that
9	A. Again, I can't say for sure if I	9	to use it without the additional chemical of the
10	would have.	10	preservative, that that would be a better choice.
11	More broadly speaking, I know at	11	And I was agreeable to it, and that is when I
12	some point from the time I started at Franklin	12	first started using a preservative-free steroid.
13	Square I have used a non-compounded	13	Q. And at the time that you first
14	triamcinolone. I have used non-compounded and,	14	started using this preservative-free steroid at,
15	yeah, non-compounded celestone which is a	15	and this was at Harford County?
16	betamethasone two salt combination.	16	A. Harford County,
17	What I can't say for sure is that	17	Q. Was the only way to get a
1.8	from 2008 to 2013 if I used a non-compounded MPA,	18	preservative-free steroid to get it from a
1.9	Q. You can't say that.	19	compounding pharmacy?
20	A. I cannot say for sure,	20	A. I was not, I guess, part of the
21	Q. Did there come a time in your	21	ordering process at Harford County, so I'm not
22	professional experience where you have made a	22	sure.
23	decision that you were going to use compounded	23	Q. Okay,
24	MPA?	24	A. Or at least at the time I wasn't
25	A. To some extent, maybe just not as	25	sure that if they had other options or, if that
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